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Attorneys for Plaintiff  
17 Switch, Ltd.

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 SWITCH, LTD.,  
a Nevada limited liability company,

Case No.: 2:17-cv-02651-GMN-EJY

21 Plaintiff,  
22 vs.

**JOINT MOTION REGARDING  
[PROPOSED] STIPULATED  
PROTECTIVE ORDER**

23 STEPHEN FAIRFAX; MTECHNOLOGY;  
24 DOES 1 through 10; and ROE ENTITIES 11  
through 20, inclusive,

25 Defendants.  
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1 Plaintiff Switch, Ltd. (“Switch”) and Defendants Stephen Fairfax and MTechnology  
 2 (“MTech”), through counsel, hereby jointly move that the Court approve and execute the [Proposed]  
 3 Stipulated Protective Order attached to this Joint Motion as **Exhibit 1**.

4 When the parties began negotiating the language of a Stipulated Protective Order in July of  
 5 2019, they were unable to agree on a few key provisions of the Stipulated Protective Order. This  
 6 caused Defendants to file with the Court a Request for Pretrial Conference and Submission of  
 7 Proposed Protective Order (Doc. # 48) on September 3, 2019. Defendants attached their proposed  
 8 Protective Order as Exhibit A to their Request.

9 On September 17, 2019, Plaintiff filed its Response to Defendants’ Request for Pretrial  
 10 Conference and Submission of Proposed Protective Order (Doc. # 52). Plaintiff attached its proposed  
 11 Protective Order as Exhibit 7 to its Response. On September 24, 2019, Defendants filed their Reply  
 12 in Support of Defendants’ Request for Pretrial Conference and Submission of proposed Protective  
 13 Order (Doc. # 53).

14 After Defendants’ Request was fully briefed, the parties continued to discuss the contents of  
 15 the proposed Protective Order and subsequently agreed upon mutually acceptable language. The  
 16 parties have attached their mutually agreed proposed Stipulated Protective Order as Exhibit 1 to this  
 17 Joint Motion. The parties request that the Court approve and execute the attached proposed Order at  
 18 its earliest convenience. The parties additionally agree that Defendants’ Request for Pretrial  
 19 Conference has been rendered moot by this Joint Motion.

20 Dated: November 18, 2019. Respectfully submitted,

21 /s/ Ronald D. Green  
 22 Ronald D. Green (NV Bar No. 7360)  
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1                   /s/ Jacob A. Reynolds  
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12                  Attorneys for Plaintiff  
13                  Switch, Ltd.

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1 Case No. 2:17-cv-02651-GMN-EJY  
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3 **CERTIFICATE OF SERVICE**  
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5 I HEREBY CERTIFY that on October 18, 2019, I electronically filed the foregoing document  
6 with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the  
7 foregoing document is being served via transmission of Notices of Electronic Filing generated by  
8 CM/ECF.

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10 Respectfully Submitted,  
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28 /s/ Crystal Sabala \_\_\_\_\_  
29 Employee,  
30 Randazza Legal Group, PLLC